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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

ESTATE OF WILLIAM HENNEFER, et al.,

Plaintiffs,

v.

YUBA COUNTY, CALIFORNIA, et al.,

Defendants

Case No. 2:22-cv-00389-TLN-CSK

**STIPULATION AND ORDER FOR
EXTENSION OF DEADLINES OF THE
COURT'S PRE-TRIAL SCHEDULING
ORDER.**

First Amended Complaint
Filed July 21, 2023

Whereas, the parties filed a Joint Status Report on August 31, 2023 (ECF 28) ("JSR") that set forth proposed deadlines for completion of discovery and the filing of dispositive motions for the Court's Pretrial Scheduling Order. The Court, however, has not issued any order regarding the dates proposed in the JSR.

Whereas, the parties have not filed any prior stipulations or motions to extend the deadlines in the Court's Pre-Trial Scheduling Order.

Whereas, although the parties have diligently prosecuted the action, a few discovery matters have arisen that will need some additional time to complete for both Plaintiffs and Defendants. At this time, the known discovery that remains to be completed after the existing discovery cutoff date are the depositions of the following individuals: Sheriff Anderson, Undersheriff Morawczynski¹, Plaintiffs JAH, JUH, and WH, CHP Flight

Officer Tyler Sivil, and Defendants Teng Saechao, and Natalie Mullins. The parties do not intend to serve additional written discovery or notice further depositions other than the foregoing depositions, unless a new source of evidence is revealed in the course of completing the foregoing depositions. The parties agree to assist and cooperate with each other to complete all discovery by the new discovery cutoff date.

Now therefore, the parties hereby submit the following **Stipulation and Proposed Order** for new discovery and dispositive motion deadlines in this action.¹.

Existing Deadlines

The JSR had the following deadlines for the Court's Pretrial Scheduling Order:

Deadline	
Date for Filing Second Amended Complaint w/o Motion to Amend the Scheduling Order	April 1, 2024
Non-Expert Discovery Cutoff & Discovery Motion Cutoff	June 1, 2024
Expert Disclosure Cutoff	July 5, 2024
Rebuttal Experts Disclosure Cutoff	August 5, 2025
Expert Discovery Cutoff	September 2, 2024
Dispositive Motion Filing Deadline	November 4, 2024

2. **Proposed New Deadlines**

The parties, by and through their respective counsel who have met and conferred, hereby **Stipulate** to the following new deadlines for the Court's Pre-trial Scheduling Order:

Deadline	
Date for Filing Second Amended Complaint w/o Motion to Amend the Scheduling Order ¹	July 19, 2024
Non-Expert Discovery Cutoff & Discovery Motion Cutoff	July 19, 2024
Expert Disclosure Cutoff	September 2, 2024
Rebuttal Experts Disclosure Cutoff	October 2, 2024
Expert Discovery Cutoff	November 4, 2024
Dispositive Motion Filing Deadline	January 23, 2025

Date: May 10, 2024

Respectfully Submitted,

By: /s/ Patrick H. Dwyer
 Patrick H. Dwyer, Attorney for Plaintiffs
 Estate of Estate of William Hennefer, JAH,
 JUH, WH, NH, and Bianca Hennefer

Dated: May 10, 2024

PORTER SCOTT
 A PROFESSIONAL CORPORATION

By /s/ Matthew W. Gross

Carl L. Fessenden
 Matthew W. Gross
 Attorneys for Defendants

¹ The date for Plaintiffs to file a Second Amended Complaint shall not trigger new deadlines for the reopening of discovery.

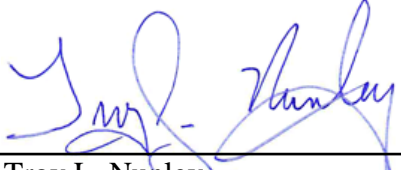
ORDER

The Court, having reviewed the Stipulation of all parties to new deadlines for the Court's Pre-trial Scheduling Order in this action, and finding good cause therefore, hereby adopts the proposed deadlines as follows:

1. Plaintiffs shall have until July 19, 2024, to file a Second Amended Complaint without having to file a motion to amend the Scheduling Order;
2. The Non-Expert Discovery & Discovery Motion Cutoff shall be July 19, 2024;
3. The Expert Disclosure Cutoff shall be **September 3, 2024**;
4. The Rebuttal Experts Disclosure Cutoff shall be October 2, 2024;
5. The Expert Discovery Cutoff shall be November 4, 2024; and
6. The Dispositive Motion Filing Deadline shall be January 23, 2025.

It is So Ordered.

DATED: May 10, 2024



Troy L. Nunley
United States District Judge